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October 13, 2016

Via Electronic Mail

The Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Courtroom 705
New York, New York 10007

MEMO ENDORSED

The Application is granted. *Sentencing is adjourned*

SO ORDERED:

Paul G. Gardephe, U.S.D.J.

Dated: Oct. 19, 2016

on April 28, 2017

at 2:30 p.m.

Re: United States v. Richard Lee, 13-CR-00539 (PGG)

Dear Judge Gardephe:

Morvillo LLP represents Richard Lee in the above-referenced matter. We write to respectfully request an adjournment of Mr. Lee's sentencing currently scheduled for October 28, 2016, and to request permission for Mr. Lee to travel beyond his pre-trial release conditions.

Request for Sentencing Adjournment

Mr. Lee pled guilty to insider trading on July 25, 2013. Mr. Lee is cooperating with the Government pursuant to an agreement. *See United States v. Lee*, No. 13-cr-539 (PGG), Affidavit of AUSA Devlin-Brown, Dkt. No. 13. For reasons bearing on Mr. Lee's cooperation agreement, Mr. Lee and the Government have jointly determined that it is in the best interest of the parties to adjourn Mr. Lee's sentencing for approximately 180 days.

We therefore respectfully request that the Court order the following schedule in connection with Mr. Lee's sentencing: Mr. Lee's sentencing submission due by April 14, 2017; Government's submission due by April 21, 2017; Sentencing set for April 28, 2017, or another date and time during that week that is convenient for the Court. The Government does not object to the proposed schedule.

Request to Travel

Mr. Lee seeks the Court's permission to travel to Bogota, Colombia to visit his wife's family over the Christmas holiday. Mr. Lee's wife is originally from Bogota; the Lees and their two children have not visited Mrs. Lee's family since the time that Mr. Lee began cooperating

MORVILLO LLP

Honorable Paul G. Gardephe

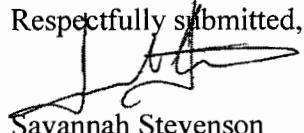
October 13, 2016

with the Government in early 2013. Accordingly, Mr. Lee respectfully requests that the Court grant him permission to travel with his wife and children to Bogota, Colombia from approximately December 15, 2016 through January 5, 2017. Should the Court grant Mr. Lee's request, Mr. Lee plans to stay with his in-laws at their apartment in Bogota and report to his Pre-trial Services Officer via email. We have conferred with the Government and it does not object to Mr. Lee's request. Should the Court grant Mr. Lee's travel request, we ask that the Court order Pre-trial Services to release Mr. Lee's passport on the condition that he surrender his passport again within one week after his return to the United States.

* * *

We are available at the Court's convenience should it wish to discuss these requests.

Respectfully submitted,



Savannah Stevenson

cc: AUSA Rebecca Mermelstein (via ECF)